REMARKS

In response to the Office Action dated April 22, 2004, Applicants respectfully request reconsideration based on the above claim amendments and the following remarks. Applicants respectfully submit that the claims as presented are in condition for allowance.

Claims 1-26 have been rejected. Please cancel claim 24 without prejudice. Upon entry of the amendment, claims 1-23 and 25-26 will be pending. Claims 24 and 25 have been rejected under 35 U.S.C. § 112. Claims 1, 4, 6-23 and 26 have been rejected under 35 U.S.C. § 102(e). Claims 2, 3, 5, 24 and 25 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Vroman. Claims 1, 15, 22, 23, and 26 are independent claims from which claims 2-14, 16-21 and 24-25 respectively depend. Claim 25 has been amended. No new matter has been added. Support for the amendments can be found in the application as originally filed on page 5 line 21 to page 6, line 18, page 6 lines 3-14 and elsewhere in the application.

Replacement FIGs 1, 2, 3, 4a, 4b, 4c, 5a, 5b, 6a, 6b, 7, 8 and 9 are enclosed. Applicants request that the former Figures be replaced by the enclosed formal drawing for FIGs 1, 2, 3, 4a, 4b, 4c, 5a, 5b, 6a, 6b, 7, 8 and 9. No new matter has been added to these Figures.

§112 Rejections

Claim 24 has been cancelled. Claim 25 has been amended to more clearly define the subject matter which Applicants regard as the invention. Applicants respectfully request the withdrawal of the § 112 rejections.

§102(e) Rejections

Claims 1, 4, 6-23 and 26 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Vroman (U.S. Patent No. 6,691,064).

Claim 1 recites:

> A computer-implemented method for diagnosing, correcting, and repairing problems with power system assembly components, the method comprising:
> *providing a list of power system assembly components;*
> receiving a selection of a component of interest;
> providing a list of potential conditions of the component of interest;
> providing, in response to the selection of one of said potential conditions, a step-by-step series of actions to take to address the selected condition.

(emphasis added).

Vroman does not disclose or suggest at least the italicized features of Applicants' claim 1.

Vroman is directed to a computerized method and system for identifying repeatedly malfunctioning transportation equipment and the root causes for the malfunction for the purpose of "[reducing] the number of vehicle road failures and [minimizing] ... vehicle down-time" (see Vroman, column 1, lines 23-24). Vroman's invention is "illustrated and described with respect to a railroad locomotive [although]...applicable to many types of equipment, including those which may be part of a large fleet, such as trucks, ships, off-road vehicles, airplanes, etc." (See Vroman, column 4, lines 26-32). A database of historical equipment malfunctions of a particular piece of equipment is maintained, each particular piece of equipment identified by a unique equipment identifier for uniquely relating each malfunction to the particular piece of equipment that malfunctioned. "[E]ven for a specific model (identified by a model number), there may be several locomotive configurations as locomotive subsystems were redesigned or changed during the model production run. Thus, in a sense, no two locomotives are the same. Adding this configuration complexity to a paper-based system presents an inordinately complex and unmanageable problem of locating the correct technical repair documentation for a specific locomotive." (See Vroman, column 2, lines 9-16.) "The hardware and software elements incorporated into a locomotive can be different, even within the same locomotive model. Thus, each locomotive is uniquely identified with a road number and the configuration management information database 54 allows retrieval of configuration information based on the unique locomotive road number. *The technician needs accurate knowledge of the locomotive configuration before undertaking a diagnosis or repair.*" (emphasis added, see Vroman, column 9, lines 38-46).

The database can be analyzed for a selected time window to review equipment malfunctions logged in the database which resulted in servicing activities over that time window. A report may be issued upon reaching a specified threshold, the report identifying any particular piece of equipment as a repeatedly-malfunctioning piece of equipment.

Thus, Vromon does not need to provide a list, much less a list of "power system assembly components" from which a selection is made, as recited by Applicants' claim 1 because Vromon accesses the database using the unique identifier for the particular piece of

equipment. Furthermore, the information *must* be accessed by the unique equipment identifier, because "*The technician needs accurate knowledge of the locomotive configuration before undertaking a diagnosis or repair.*" (See Vroman, column 9, lines 44-46).

In contrast, Applicants' invention is accessed via a display of a list of power system components and conditions from which one or more selections results in a display of a step-by-step series of actions to address the condition. In other words, in Applicant's invention, information concerning the repair, *etc.* is accessed by displaying a list of components and repeatedly selecting one of the displayed list elements rather than by knowing in advance a unique identifier that distinguishes and identifies one particular piece of equipment from all others, even from all other pieces of equipment of the same model, as Vromon discloses. In Applicants' invention, no historical data on malfunctioning power system components is kept and no unique identifier is assigned to a particular item or is used to access the repair information.

In fact, Vromon teaches away from Applicants' solution: "[E]ven for a specific model (identified by a model number), there may be several locomotive configurations as locomotive subsystems were redesigned or changed during the model production run. Thus, in a sense, no two locomotives are the same. Adding this configuration complexity to a paper-based system *presents an inordinately complex and unmanageable problem* of locating the correct technical repair documentation for a specific locomotive." (emphasis added, see Vroman, column 2, lines 9-16.) Thus, one of skill in the art would not be prompted to look to Vroman for a solution for Applicants problem space.

Hence, Applicants respectfully submit that claim 1 is patentable as are claims 2-14 which depend therefrom. Applicants' amended claim 23 and claim 26 include analogous features hence Applicants respectfully submit that claims 23 and 26 are also patentable for the reasons described above.

Claim 15 recites:

> A method of providing services for diagnosing, repairing, servicing or replacing an electric power system assembly component, the method comprising:
> providing a user interface enabling identification of a component of interest;
> receiving information concerning the component of interest;
> *providing a list of possible conditions of the component of interest;*
> receiving information concerning the condition of interest; and

providing a series of actions associated with the condition of interest.

(emphasis added).

Vroman does not disclose or suggest at least the italicized features of Applicants' claim 15. As described above, Vromon does not need to provide a list of possible conditions, as recited by Applicants' claim 15 because Vromon must access the database using the unique identifier for the particular piece of equipment because "*The technician needs accurate knowledge of the locomotive configuration before undertaking a diagnosis or repair.*" (See Vroman, column 9, lines 44-46).

Hence, Applicants respectfully submit that claim 15 is patentable as are claims 16-21 which depend therefrom. Applicants' claim 22 includes analogous features, hence Applicants respectfully submit that claim 22 is also patentable.

Applicants' claim 23 recites:

A system comprising a server computer, the server comprising:
a database of electric power assembly components to be identified, repaired, serviced or purchased;
an interface that accepts input concerning the component of interest; and
a help engine that:
receives information concerning the component of interest;
receives data concerning actions to take associated with the component of interest; and
displays the data concerning actions to take.

(emphasis added).

Vroman does not disclose or suggest at least the italicized features of Applicants' claim 23. As described above, Vroman is directed to a computerized method and system for identifying repeatedly malfunctioning equipment, as "illustrated and described with respect to a railroad locomotive [although]...applicable to many types of equipment, including those which may be part of a large fleet, such as trucks, ships, off-road vehicles, airplanes, etc." (See Vroman, column 4, lines 26-32). Hence, no database of electric power assembly components as recited by Applicants' claim 23 is disclosed or suggested. Therefore, Applicants respectfully submit that claim 23 is patentable for the reasons described above. Withdrawal of the 102 rejections of claims 1, 4, 6-23 and 26 are earnestly requested.

§103(a) Rejections

Claims 2, 3, 5, 24 and 25 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Vroman. Claim 24 has been cancelled. At least for the reasons noted above and because claims 2, 3, 5, and 25 recite additional features of the invention in combination with their respective (allowable) base claims, Applicants believe the independent claims of the present invention and the claims that depend therefrom are patentable over the prior art of record and that those of skill in the art would not be prompted to look to Vromon for a solution to Applicants' problem space. Applicants respectfully request the withdrawal of the 103 rejections of claims 2, 3, 5 and 25.

Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully submit that the present Application is in condition for allowance. Withdrawal of the rejections of the claims and an early allowance is earnestly solicited.

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